

January 20, 1999

John Rampe, D&D Program Leader  
Department of Energy  
PO Box 928  
Golden, Colorado 80402

Joseph LeGare, RFCA Project Coordinator  
Department of Energy  
PO Box 928  
Golden, Colorado 80402

99 JAN 27 AM 8:50  
CCDM

RE Decommissioning Program Plan Modifications

Dear John and Joe

We have reviewed the draft Decommissioning Program Plan modifications proposed in your letter of January 6, 1999. We believe these proposed changes are acceptable and will clarify the regulatory process surrounding the removal of fixed equipment. We disagree that the proposed modification is minor. A minor modification is one that "does not constitute a significant departure from the approved decision document." The original DPP did not include any procedure for removing contaminated fixed equipment without separate regulatory approval (e.g., through a decision document). The modification does. We believe this change is a significant departure from the approved DPP, and consequently consider the modification to be major.

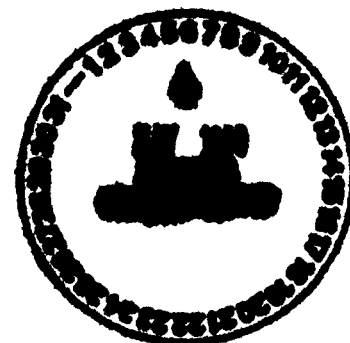
You have requested the ability to use this process during the public comment period on this modification. We ask that if you plan to do so, you explicitly identify the projects to be undertaken and discuss them with the LRA point of contact prior to project initiation.

If you have any questions regarding this matter, please contact Steve Gunderson at 303-692-3367 or Tim Rehder at 303-312-6293.

Sincerely,

Steven H. Gunderson  
CDPHE RFCA Project Coordinator

Timothy Rehder  
EPA RFCA Project Coordinator



cc Dave Shelton, K-H

ADMIN RECCRD

SW-A-003236

1/10

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## Department of Energy

ROCKY FLATS FIELD OFFICE  
P O BOX 928  
GOLDEN, COLORADO 80402-0928

JAN 06 1999

98-DOE-01199

Mr. Steve Gunderson  
RFCA Project Coordinator  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Dear Mr Gunderson

Enclosed please find two proposed modifications to the Decommissioning Program Plan (DPP) These modifications are being proposed by the U S Department of Energy Rocky Flats Field Office (RFFO) to help resolve ongoing issues relating to communications and regulatory process in the Rocky Flats decommissioning program The first proposed modification alters Section 1 1 1 of the DPP, entitled "Working Relationships " This modification clarifies the process of sharing project information and commits RFFO to notifying the regulators of buildings in which decommissioning work is planned on an annual basis The second proposed modification adds a new section (1 1 5) entitled "Removal of Certain Fixed Equipment or Systems under the DPP " This new section defines certain types of fixed equipment that may be removed using the authority of the DPP and the process for doing so

We are proposing that these be considered as minor modifications to the DPP and that they do not require public review, as would be the case for a major modification Our belief is based upon the fact that the first modification serves primarily as a clarification to the existing process of sharing information under the DPP The second modification extends our ability to perform equipment removal without a building-specific decision document, a subject already addressed in Section 1 1 4 of the DPP Should you believe that our proposal does constitute a major modification to the DPP and requires a public comment period, we ask that you allow us to perform decommissioning work under the terms of the proposed modifications pending receipt of public comment We will inform the public of our proposed changes to the DPP regardless of the type of modifications these are determined to be

Please note that we are submitting these modifications for consideration in tandem The changes to Section 1 1 1 add clarification to information sharing that regulatory staff believe were necessitated by the activities described in proposed Section 1 1 5 These proposed modifications should be approved or disapproved together and not singly

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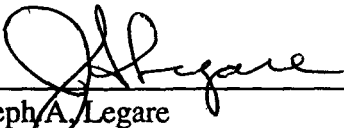
Gunderson  
98-DOE-01199

2

JAN 06 1999

Thank you for your consideration in this matter. If you have any questions regarding our proposed changes, please call John Rampe at (303) 966-6246

Sincerely,



Joseph A. Legare  
Assistant Manager for Environmental Compliance



John J. Rampe  
Decontamination and Decommissioning  
Program Leader

## Enclosures

cc (w/Enclosures)

J Roberson, OOM, RFFO  
D Lowe, Acting DMTP, RFFO  
H Dalton, AMMSD, RFFO  
P. Golan, AMPPI, RFFO  
M McCormick, NFCG, RFFO  
R DiSalvo, OCC, RFFO  
T Rehder, USEPA  
A Parker, K-H  
D Shelton, K-H  
B Mathis, K-H  
F Phillips, K-H

Faxed 12-22-98  
1:30pm JH**U.S. DEPARTMENT OF ENERGY****ROCKY FLATS FIELD OFFICE****FACSIMILE TRANSMISSION ROUTING SHEET**

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**TO: Steve Gunderson  
Tim Rehder**

**Fax # : (303) 759-5355  
Fax # : (303) 312-6067**

**FROM: NAME: Rick DiSalvo  
LOCATION: Office of Chief Counsel  
Rocky Flats Field Office**

**PHONE NO.: (303) 966-2026  
FAX NO.: (303) 966-3717**

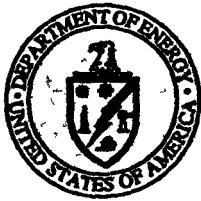
**Rocky Flats Verification Telephone No: (303) 966-2026**

**Comments: Per John Rampe's agreement, here is a draft with the proposed changes to the DPP. A copy will be formally transmitted within a week.**

**OPERATOR: Heather Henderson**

**DATE: 12-22-98**

**Number of Pages 4  
(Excluding Cover Sheet)**



## Department of Energy

ROCKY FLATS FIELD OFFICE  
P O BOX 928  
GOLDEN, COLORADO 80402-0928

JAN 06 1999

98-DOE-01199

Mr Tim Rehder  
U S Environmental Protection Agency  
Region VIII  
ATTN Rocky Flats Project Manager 8EPR-FT  
999 18<sup>th</sup> Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405

Dear Mr Rehder

Enclosed please find two proposed modifications to the Decommissioning Program Plan (DPP) These modifications are being proposed by the U S Department of Energy Rocky Flats Field Office (RFFO) to help resolve ongoing issues relating to communications and regulatory process in the Rocky Flats decommissioning program The first proposed modification alters Section 1 1 1 of the DPP, entitled "Working Relationships " This modification clarifies the process of sharing project information and commits RFFO to notifying the regulators of buildings in which decommissioning work is planned on an annual basis The second proposed modification adds a new section (1 1 5) entitled "Removal of Certain Fixed Equipment or Systems under the DPP " This new section defines certain types of fixed equipment that may be removed using the authority of the DPP and the process for doing so

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Rehder  
98-DOE-01199


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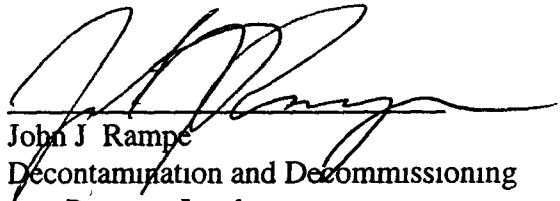
necessitated by the activities described in proposed Section 1.1.5. These proposed modifications should be approved or disapproved together and not singly.

Thank you for your consideration in this matter. If you have any questions regarding our proposed changes, please call John Rampe at (303) 966-6246.

Sincerely,



Joseph A. Legare  
Assistant Manager for Environmental Compliance



John J. Rampe  
Decontamination and Decommissioning  
Program Leader

Enclosures

cc (w/Enclosures)

J. Roberson, OOM, RFFO  
D. Lowe, Acting DMTP, RFFO  
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M. McCormick, NFCG, RFFO  
R. DiSalvo, OCC, RFFO  
S. Gunderson, CDPHE  
A. Parker, K-H  
D. Shelton, K-H  
B. Mathis, K-H  
F. Phillips, K-H

To capture the discussions regarding notifying the regulators of D&D activities, DOE proposes the following be added to Section 1.1.1 of the DPP, entitled "Working Relationships". The following wording (in bold) would be inserted in the existing paragraph entitled "Timely sharing of information":

1) Timely sharing of information – All parties will use their best effort to share project and program information in a timely manner. DOE will inform the regulators on an ongoing basis of building disposition activities sitewide, including decommissioning and pre-decommissioning activities. Information sharing efforts may include but need not be limited to: updates of the overall Site closure baseline, briefings on the development of annual work plans and budgets, briefings on changes to approved baselines affecting building disposition activities, invitations to attend project status briefings, and consultations on decommissioning strategy. **DOE will notify CDPHE and EPA in writing at the start of each fiscal year of those buildings in which DOE intends to conduct decommissioning activities. If DOE intends to perform decommissioning in additional buildings during the year, it will notify CDPHE and EPA in writing of those additional buildings. CDPHE and EPA recognize their responsibility to provide timely comments on decision documents and other documents for which their comments have been requested, and agree to raise concerns regarding the Site building disposition program and projects in a timely manner DOE will share decommissioning project-related information in a timely manner with the LRA's project points of contact. This project-related information may include written information that the DOE and LRA project points of contact agree is relevant to the ongoing regulatory oversight of the project, such as IWCP's, site procedures, data, etc. DOE will also use good faith efforts to ensure that the LRA points of contact are aware of significant project meetings, including management reviews, which will be open to LRA representatives. The LRA point of contact may provide DOE with comments regarding project planning and execution. CDPHE and EPA recognize that decommissioning projects will proceed as scheduled, whether or not the LRA point of contact has taken the opportunity to attend meetings or read the written information provided.**

### 1.1.5. Removal of Certain Fixed Equipment or Systems under the DPP

This section describes the removal of certain fixed equipment and systems from Type 1, 2, and 3 buildings undergoing the disposition process. Fixed equipment or systems removal conforming with this section reflects agreement that no other RFCA decision document or RFCA decision as described in Section 1.1.4. and Figure 1.1-1 is needed for this work. However, DOE and the LRA, will continue the consultative process regarding the removal of fixed equipment from buildings. The purpose of removing fixed equipment and systems as described in this section is to facilitate performance of the reconnaissance level characterization survey, to promote the timely disposition of excess useable equipment or the disposition of waste and to use available building manpower in an efficient manner.

For the purposes of this section, fixed equipment and systems means those items that are attached to the floor or walls or ceiling of a building, but which are not connected to building systems, such as plumbing or ventilation, that could reasonably be expected to provide a pathway for contaminants to reach the environment. Fixed equipment may be connected to utilities that do not provide such a pathway, such as electrical or telephone systems. As examples, fixed equipment includes machinery that is bolted or otherwise attached to floors or walls, cabinets, lockers, benches and electrical panels. Fixed equipment under this section also includes items such as hoods, gloveboxes and tanks that may have been attached to the building but never connected to building ventilation or plumbing systems. On a case-by-case basis, fixed equipment that is connected to building systems may be removed pursuant to this section of the DPP, with the agreement of the parties. Otherwise, the need for a RFCA decision or decision document for systems that have been connected, but which are uncontaminated, and for attached equipment inside of gloveboxes will be determined per Section 1.1.4.

Pursuant to this section, DOE may remove fixed equipment and systems as defined herein, regardless whether or not such equipment is contaminated with radiological or hazardous substances.

DOE shall follow a removal process for fixed equipment and systems that ensures that such material is appropriately described, characterized and dispositioned. The fixed equipment and systems removal process will consist of the following documented steps

- 1) A preliminary radiological/hazardous substance evaluation, taking into account such factors as the operating history of the equipment and the area or building in which the equipment is located, will determine the need to perform additional characterization of the equipment.
- 2) If indicated by the preliminary radiological/hazardous substance evaluation, a radiological survey and /or hazardous substance characterization will be performed to determine if the equipment fits the criterion for free release



- 3) If the equipment is to be dispositioned as waste, the characterization is properly performed to ensure conformance with the waste acceptance criteria for storage and/or disposal.
- 4) Removal of fixed equipment will be in accordance with Site radiological, hazardous substance and hazardous waste control procedures to control contamination-

(The decision to re-use fixed equipment and systems, as defined in this section, either on-site or elsewhere, is solely DOE's. Removal of fixed equipment for re-use on-site or elsewhere in the DOE complex is mission-related work not subject to regulation under this DPP.)

By implementing the process outlined above, DOE will ensure that fixed equipment will be characterized and dispositioned appropriately. Equipment containing greater than the free release limits of radionuclides or other hazardous substances will not be shipped to a sanitary landfill, nor released for unrestricted public use.

DOE will ensure that site procedures are developed and maintained to govern the characterization and removal of fixed equipment. In general, the following documents establish the procedures or conditions under which the removal of fixed equipment takes place.

- Health and Safety Procedure 18.10 governs the characterization and release of property and waste.
- The Site Integrated Work Control Program Manual governs work planning and hazards analysis and work package development process.
- The Site Radiological Safety Practices Manual establishes methods for the control of radioactive contamination.
- The Site transportation manuals establish the procedures for packaging and shipment of equipment and waste.
- Individual authorization basis documents (such as Safety Analysis Reports) establish the safety envelopes for individual buildings.

DOE will make these and other Site procedures available to the LRA. These documents are not, however, subject to LRA approval.

Per Section 1.1.1 of this DPP, DOE, CDPHE and EPA encourage and expect an open dialogue among regulator, DOE and contractor project points of contact regarding the removal of fixed equipment, and will use the RFCA consultative process to share project information on an ongoing basis. DOE will make available to the LRA on request any and all documentation relating to the characterization and removal of fixed equipment and systems, subject to classification requirements. Key meetings and evolutions will be open to LRA representatives. If management reviews are performed prior to the removal of fixed equipment, the LRA will be given the opportunity to attend these reviews.

NOTE. To accommodate this proposed new section to the DPP, and to make it consistent with existing language regarding equipment removal without a decision

document, the following language is proposed as a parenthetical, to be added to the end of the second paragraph of Section 1.1.4, at line 314:

(This section of the DPP governs fixed equipment such as gloveboxes that are connected to building systems such as ventilation or plumbing, but which DOE believes are not contaminated. Section 1.1.5, below, governs fixed equipment, such as machinery, that is not connected to building systems such as ventilation or plumbing, and and to equipment such as gloveboxes or tanks that have never been connected to building systems such as gloveboxes or plumbing.)

Additionally, existing DPP section 1.1.5 will be renumbered as section 1.1.6.